

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES
(DBP/USPS-32 AND 33)
(January 26, 2012)**

The United States Postal Service provides institutional responses to the above-listed interrogatories of David Popkin dated January 12, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN**

DBP/USPS-32 [a] Should the Northern New Jersey Metro P&DC consolidate its operation to the DVD P&DC as proposed, will it now be necessary to bring my mail to the DVD P&DC rather than the NNJ Metro P&DC if I want to receive the SCF destination rate for mail that presently receives the SCF destination rate by bringing it to the NNJ Metro P&DC?

[b] Will any of the proposed consolidations throughout the country maintain their BMEU and/or destination drop off capability so as not to require additional travel?

[c] If so, why isn't this capability being utilized at the NNJ Metro P&DC?

RESPONSE:

[a] The Postal Service cannot provide an accurate response to this subpart without more specific identification of the mail class or product considered in this hypothetical situation.

[b-c] The impact will depend upon the results of the individual AMP studies.

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DBP/USPS-33 Please confirm, or explain if you are unable to confirm, each of the following statements:

- [a] There are a number of ZIP Code pairs that presently have overnight service standards for First-Class Mail.
- [b] All of these ZIP Code pairs will convert to either 2-day or 3-day service standards for First-Class Mail.
- [c] This conversion to 2-day and 3-day service standards represents a reduction in service.
- [d] The price for First-Class Mail will remain the same before and after the conversion noted in subpart [b] above.
- [e] A reduction in service while maintaining the same price represents a price increase.
- [f] A similar price increase would also exist in First-Class Mail which is converted from a 2-day service standard to a 3-day service standard.
- [g] Mailers who have a need to obtain the service standard that presently exists for First-Class Mail that is being converted to a slower service in the present Docket, will still be able to obtain the current delivery standard by sending their mail as Priority Mail or Express Mail.
- [h] Priority Mail and Express Mail have a higher price than First-Class Mail.

RESPONSE:

- [a] Confirmed.
- [b] Not confirmed. Some ZIP Code pairs will retain an overnight standard for qualifying mail.
- [c] Please see the response to subpart b. A conversion from 2-day to 3-day service can be viewed as a reduction.
- [d] Each First-Class Mail price implemented in January 2012 will eventually change in some direction at some point after the conversion. The direction and timing have not been determined.
- [e] Not confirmed. Although the price would remain the same, the Postal Service will not attempt to dissuade you from that view.

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RESPONSE to DBP/USPS-33 continued:

[f] It is not clear from this question which price increases are being regarded as similar for purposes of comparison.

[g] Please see the response to subpart b. It is confirmed that there will continue to be a measure of overlap between the service standards for First-Class Mail, Priority Mail and Express Mail.

[h] This statement describes historical prices.